

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:13CR250
v.	§	Judge Crone
	§	
MARK ALLEN CRIPPEN	§	

**ELEMENTS OF THE OFFENSE**

The defendant, **Mark Allen Crippen (Crippen)**, is charged in Count One of the Indictment with violating of 18 U.S.C. §§ 2252(a)(4)(B) and (b)(2)(Possession of Child Pornography). The elements of the offense that the government must prove beyond a reasonable doubt, but that **Crippen** would admit if his plea is accepted, are:

1. The defendant knowingly possessed one or more matters which contained any visual depiction of a minor engaged in sexually explicit conduct;
2. Such visual depiction had been mailed, shipped, or transported in interstate or foreign commerce, by any means, including by computer, or was produced using materials which had been so mailed, shipped, or transported;
3. The production of the visual depiction involved the use of a minor engaging in sexually explicit conduct and the visual depiction was of such conduct; and
4. The defendant knew that the visual depiction involved the use of a minor engaging in sexually explicit conduct.

Respectfully submitted,

JOHN M. BALES  
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/s/

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**CERTIFICATE OF SERVICE**

I certify that a copy of this document was served by electronic filing to opposing counsel on December 22, 2014.

/s/

Marisa J. Miller